

**UNITED STATES DISTRICT COURT FOR THE  
MIDDLE DISTRICT OF TENNESSEE  
NASHVILLE DIVISION**

ARIEL SIMPSON, DOMINIQUE )  
BROGDEN, TARA MARTINS, GREGORY ) Case No. 3:22-cv-00747  
SWANN, DANIELLE ROMANOFF and )  
PERRY ROYSTER, Individually and on ) Judge Aleta A. Trauger  
Behalf of All Others Similarly Situated, )  
Plaintiffs, )  
v. )  
NISSAN NORTH AMERICA, INC. and )  
NISSAN MOTOR CO., LTD., )  
Defendants )

**PLAINTIFFS' NOTICE OF VOLUNTARY DISMISSAL WITHOUT PREJUDICE OF  
NISSAN MOTOR CO., LTD**

Plaintiffs Ariel Simpon, Dominique Brodgen, Tara Martins, Gregory Swann, Danielle Romanoff and Perry Royster (“Plaintiffs”), on behalf of themselves and all others similarly situated, voluntarily dismiss their complaint against Nissan Motor Co., Ltd., without prejudice pursuant to Federal Rule of Civil Procedure 21,<sup>1</sup> with each side to bear its own costs and attorneys’ fees. Plaintiffs aver that dismissal of Defendant Nissan Motor Co., Ltd. will maximize efficiency and judicial economy.

Dated: March 11, 2024

Respectfully submitted,

/s/ *J. Gerard Stranch, IV*

J. Gerard Stranch, IV (BPR #23045)

<sup>1</sup> Courts in the Sixth Circuit recognize Rule 21, as opposed to Rule 41, as the appropriate vehicle for dismissal of a single party. See, e.g., *Mullins v. C.R. Bard, Inc.*, 2020 WL 4288400, at \*1 (E.D. Ky. July 27, 2020) (collecting cases).

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## CERTIFICATE OF SERVICE

The undersigned certifies the foregoing document was filed with the Court's Case Management/Electronic Case Filing System, on March 11, 2024, and served upon the following counsel:

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